

White & Case LLP
1155 Avenue of the Americas
New York, New York 10036-2787

Tel +1 212 819 8200
Fax +1 212 354 8113
whitecase.com

Direct Dial +212-819-8891 opell@whitecase.com

October 24, 2014

By Hand and Via ECF

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: In re Application of Gorsoan Limited and Gazprombank OJSC for an Order Pursuant to 28 U.S.C. §1782 to Conduct Discovery for Use in a Foreign Proceeding, No. 13-mc-00397-P1 (S.D.N.Y.)

Dear Judge Gardephe:

We represent Petitioners Gorsoan Limited and Gazprombank OJSC in the above-referenced proceeding. Per this Court's order of October 22, 2014 (Dkt. No. 24), attached is a copy of the Second Supplemental Declaration of Alexandros Tsirides, dated October 24, 2014, with exhibits ("Tsirides Decl.").

The Tsirides Declaration shows that, contrary to Movants' claims, Janna Bullock has been personally served with the Cyprus Court's Freezing and Injunction Order of March 6, 2013. Indeed, Ms. Bullock has been personally served three times with the Cyprus Order—on April 24, 2013, August 5, 2014, and October 20, 2014. Tsirides Decl. ¶¶ 4, 9, 10. (If necessary, Petitioners can provide the photos and videos of personal service being completed, which evidence has been submitted to the Cyprus Court.)

The Tsirides Declaration also explains that Petitioners are pursuing civil contempt against Bullock in the Cyprus proceedings, showing the importance of the discovery sought in this Court under 28 U.S.C. § 1782. Tsirides Decl. ¶¶ 7-10. As Petitioners have shown, Bullock's defiance of the Cyprus Court's discovery orders provides further support for the discovery sought under this Court's Section 1782 discovery order of December 3, 2013. See Pet. Mem. [Dkt. 16], at 7 (citing Brandi-Dohrn v. IKB Deutsche Industriebank AG, 673 F.3d 76, 82-84 (2d Cir. 2012); In re Application of Servicio Pan Americano de Proteccion, C.A., 354 F. Supp. 2d 269, 274 (S.D.N.Y. 2004); In re Auto-Guadeloupe Investissement S.A., No. 12-mc-221, 2012 U.S. Dist. LEXIS 147379, at *16-17 (S.D.N.Y. Oct. 10, 2012)).

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Accordingly, the Motion to Quash should be denied, and Petitioners should be allowed to proceed with Section 1782 discovery. We appreciate the Court's attention to this pressing matter.

Respectfully submitted,



Owen C. Pell

cc: Stuart A. Smith (Counsel for Movants)

Enclosure (Second Supplemental Declaration of Alexandros Tsirides dated October 24, 2014)